

1 ARIEL E. STERN, ESQ.
Nevada Bar No. 8276
2 CHRISTINE M. PARVAN, ESQ.
Nevada Bar No. 10711
3 AKERMAN SENTERFITT LLP
1160 Town Center Drive, Suite 330
4 Las Vegas, Nevada 89144
Telephone: (702) 634-5000
5 Facsimile: (702) 380-8572
Email: ariel.stern@akerman.com
6 Email: christine.parvan@akerman.com

7 *Attorneys for Defendants*
8 *Bank of America Corporation, Bank of*
9 *America, National Association, itself and as*
10 *successor by merger to BAC Home Loans*
11 *Servicing, LP, and ReconTrust Company,*
12 *N.A.*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

JACK THACKER and LISA THACKER,

Plaintiffs,

vs.

15 BANK OF AMERICA CORP, BANK OF
16 AMERICA, NATIONAL ASSOCIATION, BAC
HOME LOANS SERVICING LP,
17 RECONTRUST COMPANY N.A.,

Defendants.

Case No.: 3:11-cv-00113-RCJ-WGC

**PROPOSED STIPULATION AND ORDER
FOR EXTENSION OF TIME TO
SUBSTITUTE CARRINGTON
MORTGAGE HOLDINGS, LLC**

18 Plaintiffs Jack and Lisa Thacker, through their counsel of record, Steve Evenson, Esq. of
19 Evenson Law Office, and Bank of America Corporation, Bank of America, National Association,
20 itself and as successor by merger to BAC Home Loans Servicing, LP, and ReconTrust Company,
21 N.A. (collectively **defendants**), through their counsel of record Ariel E. Stern, Esq. and Christine M.
22 Parvan, Esq. of the law firm of Akerman LLP hereby stipulate as follows:

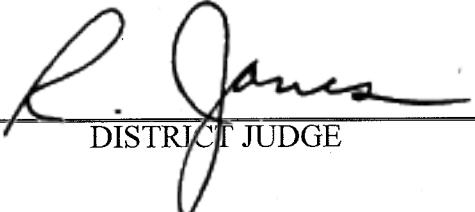
- 23 1. On January 12, 2015, this Court issued an order denying both plaintiffs' motion to set aside
24 the subject settlement agreement and defendants' motion to enforce the settlement agreement;
- 25 2. The Court imposed a deadline of seven (7) days from entry of its order for plaintiffs to file a
26 motion to substitute Carrington Mortgage Holdings, LLC as a party to this action and request
27 this Court enforce the settlement agreement by having Carrington sign it; and
28

3. As Carrington has agreed to provide written confirmation to plaintiffs' counsel that it will implement the loan modification as contemplated under the settlement agreement if plaintiffs make the required lump-sum payment, the parties' respectfully request the Court grant plaintiffs' an additional ten (10) days to file the aforementioned motion to substitute Carrington in order to give the parties additional time to attempt to resolve this matter without further litigation.

Akerman Senterfitt LLP

/s/ Christine M. Parvan
 ARIEL E. STERN, ESQ.
 Nevada Bar No. 8276
 CHRISTINE M. PARVAN, ESQ.
 Nevada Bar No. 10711
 1160 Town Center Drive, Suite 330
 Las Vegas, Nevada 89144

IT IS SO ORDERED this 21st day of January, 2015.


 DISTRICT JUDGE

Submitted by:

/s/ Christine M. Parvan
 ARIEL E. STERN, ESQ.
 Nevada Bar No. 8276
 CHRISTINE M. PARVAN, ESQ.
 Nevada Bar No. 10711
 1160 Town Center Drive, Suite 330
 Las Vegas, NV 892144

Attorneys for Defendants

/s/ Steve Evenson
 Steve Evenson
 Evenson Law Office
 P. O. Box 1023
 Lovelock, NV 89419

Attorneys for Plaintiffs

AKERMAN SENTERFITT LLP

1160 TOWN CENTER DRIVE, SUITE 330
 LAS VEGAS, NEVADA 89144
 TEL.: (702) 634-5000 - FAX: (702) 380-8572